

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TEVA PHARMACEUTICALS USA, INC.,)	
TEVA PHARMACEUTICAL INDUSTRIES LTD.,)	REDACTED PUBLIC
and NOVOPHARM, LTD.,)	VERSION
)		
Counterclaim Plaintiffs,)	C.A. No. 02-1512 (SLR)
v.)	CONSOLIDATED
ABBOTT LABORATORIES,)	
FOURNIER INDUSTRIE ET SANTÉ, and)	
LABORATOIRES FOURNIER S.A.,)	
Counterclaim Defendants.)	
)		
IMPAX LABORATORIES, INC.,)	
)		
Counterclaim Plaintiff,)	C.A. No. 03-120 (SLR)
v.)	CONSOLIDATED
ABBOTT LABORATORIES,)	
FOURNIER INDUSTRIE ET SANTÉ, and)	
LABORATOIRES FOURNIER S.A.,)	
)		
Counterclaim Defendants.)	
)		
IN RE TRICOR DIRECT PURCHASER)	C.A. No. 05-340 (SLR)
ANTITRUST LITIGATION)	CONSOLIDATED
)		
THIS DOCUMENT RELATES TO:)	
ALL ACTIONS)	
)		
IN RE TRICOR INDIRECT PURCHASER)	C.A. No. 05-360 (SLR)
ANTITRUST LITIGATION)	CONSOLIDATED
)		
THIS DOCUMENT RELATES TO:)	
ALL ACTIONS)	

**DEFENDANTS' JOINT APPENDIX
IN SUPPORT OF SUMMARY JUDGMENT MOTIONS**

VOLUME III OF III

MORRIS, NICHOLS, ARSHT & TUNNELL LLP
Mary B. Graham (#2256)
James W. Parrett, Jr. (#4292)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
mgraham@mnat.com
jparrett@mnat.com

OF COUNSEL:

William F. Cavanaugh, Jr.
Thomas W. Pippert
Chad J. Peterman
Alexis Deise
PATTERSON, BELKNAP, WEBB & TYLER LLP
1133 Avenue of the Americas
New York, NY 10036-6710
(212) 336-2000

Attorneys for Defendant Abbott Laboratories

Dated: May 5, 2008

RICHARDS, LAYTON & FINGER, P.A.
Frederick L. Cottrell, III (#2555)
Anne Shea Gaza (#4093)
One Rodney Square
P.O. Box 551
Wilmington, DE 19899
(302) 651-7700
cottrell@rlf.com
gaza@rlf.com

OF COUNSEL:

William Baer
James Cooper
Anne P. Davis
ARNOLD & PORTER LLP
555 12th Street, N.W.
Washington, DC 20004
(202) 942-5000

Timothy C. Bickham
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, N.W.
Washington, DC 20036-1795
(202) 429-5517

*Attorneys for Fournier Industrie Et Santé and
Laboratoires Fournier, S.A.*

DEFENDANTS' JOINT APPENDIX
TABLE OF CONTENTS

DOCUMENT DESCRIPTION	APPENDIX PAGES
DEPOSITION TRANSCRIPTS/EXHIBITS	
Dr. Loyd V. Allen Deposition Transcript, December 12, 2001	DJA-1 to DJA-4
Pierre Diebolt Deposition Transcript, June 8, 2004	DJA-5 to DJA-7.003
Edward Grieff Deposition Transcript, June 25, 2004	DJA-7.004 to DJA-7.008
Dr. Gordon Amidon Deposition Transcript, November 18, 2004	DJA-8 to DJA-9
Dr. Loyd V. Allen Deposition Transcript, November 23, 2004	DJA-10 to DJA-12
James McNeil Deposition Transcript, December 22, 2004	DJA-12.001 to DJA-12.006
Philippe Reginault Deposition Transcript, October 24, 2006	DJA-13 to DJA-22
Philippe Reginault Deposition Exhibit 1, October 24, 2006	DJA-23 to DJA-28
Philippe Reginault Deposition Exhibit 4, October 24, 2006	DJA-29 to DJA-32
Philippe Reginault Deposition Exhibit 8, October 24, 2006	DJA-33 to DJA-46
Philippe Reginault Deposition Exhibit 25, October 24, 2006	DJA-47 to DJA-52
Pascale Blouquin, Deposition Transcript, November 30, 2006	DJA-52.001-52.004
Dr. Peter Jones Deposition Transcript, November 28, 2007	DJA-53 to DJA-57
Keith B. Leffler Deposition Transcript, December 7, 2007	DJA-58 to DJA-80
Dr. Sander J. Robins Deposition Transcript, December 19, 2007	DJA-81 to DJA-97
Iain Cockburn Deposition Transcript, January 9, 2008	DJA-98 to DJA-106
Dr. Loyd V. Allen Deposition Transcript, January 10, 2008	DJA-107 to DJA-108
Dr. Stephen P. Schondelmeyer Deposition Transcript, January 24, 2008	DJA-109 to DJA-118

DOCUMENT DESCRIPTION	APPENDIX PAGES
Dr. Gordon Amidon Deposition Transcript, January 29, 2008	DJA-119 to DJA-126
Charles L. King III Deposition Transcript, January 29, 2008	DJA-127 to DJA-136
Arthur Schwartzbard Deposition Transcript, February 12, 2008	DJA-137 to DJA-148
Dr. Hal J. Singer Deposition Transcript, February 21, 2008	DJA-149 to DJA-158
Dr. Richard Grimm Deposition Transcript, March 4, 2008	DJA-159 to DJA-168
Dr. Rodolfo Soto Deposition Transcript, March 12, 2008	DJA-169 to DJA-196
Dr. Jeffrey J. Leitzinger Deposition Transcript, March 13, 2008	DJA-197 to DJA-212
DISCOVERY DOCUMENTS	
2005 Marketing Plan (Abbott_Tricor0000007-Abbott_Tricor0000062)	DJA-213 to DJA-268
Pharmaceutical Products Division Cardiology Franchise Summary 2004 Plan (Abbott_Tricor00000111- Abbott_Tricor00000117)	DJA-269 to DJA-275
TriCor 2003 Marketing Plan (Abbott_Tricor00013709, Abbott_Tricor00013743, Abbott_Tricor00013794)	DJA-276 to DJA-278
TriCor '03 Plan (Abbott_Tricor00013965- Abbott_Tricor00014049)	DJA-279 to DJA-363
2006 Strategic Marketing Plan (Abbott_Tricor00056920- Abbott_Tricor00056957)	DJA-364 to DJA-401
Section VI Bioavailability/Bioequivalence (Continued) IABII002617- IABII002619	DJA-402 to DJA-404
Data Summary; In-Process Control in Manufacturing the Biobatch of Fenofibrate Tablets, 100 mg (Lot #R02015) (IABII003278)	DJA-405
Section VII Components and Composition (Continued) IABII014506	DJA-406
In-Process Control in Manufacturing the Biobatch of Fenofibrate Tablets, 54 mg IABII014666	DJA-407

DOCUMENT DESCRIPTION	APPENDIX PAGES
Teva ANDA Application excerpt	DJA-408 to DJA-409
Lofibra Marketing Communications Plan Teva (Teva-TriCor044141- Teva-TriCor044165)	DJA-410 to DJA-434
Convention Report (Teva-TriCor046652-Teva-TriCor46653)	DJA-435 to DJA-436
Lofibra Training Manual (Teva-TriCor083807, Teva-TriCor083859- Teva-TriCor083886)	DJA-437 to DJA-465
REPORTS AND DECLARATIONS	
Expert Statement of Dr. Arthur H. Goldberg in Rebuttal to the Expert Report of Dr. Loyd V. Allen, Jr., October 31, 2001	DJA-466 to DJA-471
Expert Report of Dr. Arthur H. Goldberg, February 15, 2002	DJA-472 to DJA-475
Expert Report of Dr. Loyd V. Allen, Jr., August 26, 2004	DJA-476 to DJA-480
Expert Report of Dr. Stephen R. Byrn, August 27, 2004	DJA-481 to DJA-578
Rebuttal Expert Report of Dr. Gordon Amidon, October 15, 2004	DJA-579 to DJA- 617
Expert Report of Dr. Robert O. Williams III, October 15, 2004	DJA-618 to DJA-651
Declaration of Dr. Robert O. Williams III, January 18, 2005	DJA-652 to DJA-656
Supplemental Expert Report of Dr. Stephen R. Byrn, May 27, 2005	DJA-657 to DJA-667
Declaration of Michael A. Jones, August 16, 2006	DJA-668 to DJA-681
Expert Report of Dr. Edmund Elder, December 14, 2006	DJA-682 to DJA-684
Expert Report of Professor Iain M. Cockburn, December 15, 2006	DJA-685 to DJA-731
Expert Report of Gerhard Levy Relating to the Antitrust Case	DJA-732 to DJA-733
Expert Report of Dr. Gregory K. Leonard, December 15, 2006	DJA-734 to DJA-738
Expert Report of Richard H. Grimm, M.D., M.P.H., P.H.D. on behalf of End Payor Plaintiffs and Pacificare, December 15, 2006	DJA-739 to DJA-747

DOCUMENT DESCRIPTION	APPENDIX PAGES
Expert Report of Jeffrey J. Leitzinger, PH.D, December 15, 2006	DJA-748 to DJA-774
Expert Report of Keith B. Leffler in In Re Tricor Direct Purchaser Antitrust Litigation, December 15, 2006	DJA-775 to DJA-793
Declaration of Charles King III Concerning Liability and Product Market Definition, December 15, 2006	DJA-794 to DJA-814
Declaration of Charles King III Concerning Damages, December 15, 20062006 Physicians' Desk Reference (60 th ed. 2002) Zetia	DJA-815 to DJA-820
Expert Report of Gerhard Levy Relating to the Antitrust Case, December 15, 2006	DJA-821 to DJA-824
Expert Report of Stephen W. Schondelmeyer, Pharm.D., PH.D., December 15, 2006	DJA-825 to DJA-842
Expert Report of Dr. Arthur Schawrtzbard, M.D., F.A.C.C., January 16, 2007	DJA-843 to DJA-846
Expert Report of Dr. Peter Howard Jones, April 17, 2007	DJA-847 to DJA-859
Expert Report of Dr. Gordon Amidon, April 18, 2007	DJA-860 to DJA-875
Expert Report of Dr. Stephen R. Byrn, April 18, 2007	DJA-877 to DJA-907
Expert Report of Dr. Arthur H. Goldberg, April 18, 2007	DJA-908 to DJA-926
Expert Report of Dr. James McGinty, April 18, 2007	DJA-927 to DJA-942
Expert Report of Dr. Robert O. Williams, III, April 18, 2007	DJA-943 to DJA-953
Expert Report of Richard J. Gilbert, PH.D, June 29, 2007	DJA-954 to DJA-990
Expert Report of Margaret E. Guerin-Calvert, June 29, 2007	DJA-991 to DJA-1006
Expert Report of Richard J. Gilbert, PH.D, June 29, 2007	DJA-1007 to DJA-1036
Expert Report of Sander J. Robins, M.D., July 13, 2007	DJA-1037 to DJA-1046
Expert Report of Rodolfo Soto, M.D., July 20, 2007	DJA-1047 to DJA-1050

DOCUMENT DESCRIPTION	APPENDIX PAGES
Reply Expert Report of Stanley A. Kaplan, Ph.D., August 10, 2007	DJA-1051 to DJA-1053
Surrebuttal of Charles King III Concerning Liability and Product Market Definition, October 5, 2007	DJA-1054 to DJA-1067
Rebuttal Expert Report of Professor Iain M. Cockburn, October 8, 2007	DJA-1068 to DJA-1087
Rebuttal Expert Report of Jeffrey J. Leitzinger, PH.D., October 8, 2007	DJA-1088 to DJA-1094
Expert Report of Keith B. Leffler, October, 8, 2007	DJA-1095 to DJA-1105
Supplemental Expert Report of Richard J. Gilbert, PH.D, March 28, 2008	DJA-1106 to DJA-1118
LEGAL FILINGS	
Defendant's Memorandum of Law in Support of Motion for Partial Summary Judgment of Non-Infringement, US Dist. Court for the N. District of Illinois Eastern Division, April 23, 2002	DJA-1119 to DJA-1122
Declaration of Philippe Reginault, Deposition Exhibit 25	DJA-1123 to DJA-1128
Declaration of Charles King III, Concerning Damages, December 15, 2006	DJA-1129 to DJA-1134
Declaration of Charles King III, Concerning Liability and Product Market Definition, December 15, 2006	DJA-1135 to DJA-1155
MISCELLANEOUS	
Webster's Third New International Dictionary of the English Language Unabridged	DJA-1156 to DJA-1157
IMS Business Watch Article "1999 In Review" May 2000	DJA-1158 to DJA-1168
ATP III Executive Summary May 2001	DJA-1169 to DJA-1208
2002 Physicians' Desk Reference (56 th ed. 2002)	DJA-1209 to DJA-1209
2002 Physicians' Desk Reference (56 th ed. 2002)	DJA-1210 to DJA-1214

DOCUMENT DESCRIPTION	APPENDIX PAGES
Teva Internal Document re Formula Comparison, June 14, 2002	DJA-1215 to DJA-1238
Kurt Nielsen Letter, August 21, 2002	DJA-1239 to DJA-1247
Charles Wolfe Letter, December 9, 2002	DJA-1248 to DJA-1264
Mark Shaw Letter, January 28, 2003	DJA-1265 to DJA-1279
Declaration of Philippe Reginault, June 13, 2003	DJA-1280 to DJA-1285
Kurt Nielsen Letter, July 16, 2003	DJA-1286 to DJA-1293
Mark Shaw Letter, August 8, 2003	DJA-1294 to DJA-1300
Mark Shaw Letter, November 28, 2003	DJA-1301 to DJA-1320
Kurt Nielsen Letter, December 12, 2003	DJA-1321 to DJA-1329
Blouquin Declaration, February 17, 2005	DJA-1330 to DJA-1334
2006 Physicians' Desk Reference (60 th ed. 2002) Crestor	DJA-1335 to DJA-1340
2006 Physicians' Desk Reference (60 th ed. 2002) Pravachol	DJA-1341 to DJA-1346
2006 Physicians' Desk Reference (60 th ed. 2002) Advicor	DJA-1347 to DJA-1352
2006 Physicians' Desk Reference (60 th ed. 2002) Niaspan	DJA-1353 to DJA-1357
2006 Physicians' Desk Reference (60 th ed. 2002) Zocor	DJA-1358 to DJA-1364
2006 Physicians' Desk Reference (60 th ed. 2002) Vytorin	DJA-1365 to DJA-1369
2006 Physicians' Desk Reference (60 th ed. 2002) Zetia	DJA-1370 to DJA-1376
2006 Physicians' Desk Reference (60 th ed. 2002) Lipitor	DJA-1377 to DJA-1380
2006 Physicians' Desk Reference (60 th ed. 2002) Lescol	DJA-1381 to DJA-1386
2006 Physicians' Desk Reference (60 th ed. 2002) Omacor	DJA-1386 to DJA-1387

DOCUMENT DESCRIPTION	APPENDIX PAGES
Tricor Label 48 mg and 145 mg	DJA-1387.001 to DJA-1387.012
2007 Standards of Medical Care in Diabetes	DJA-1388 to DJA-1477
2007 Washington Manual of Medical Therapeutics - WMMT - Dyslipidemia	DJA-1478 to DJA-1489
PATENTS	
United States Patent 4,895,726	DJA-1490 to DJA-1494
United States Patent 6,074,670	DJA-1495 to DJA-1503
United States Patent 6,277,405	DJA-1504 to DJA-1512
United States Patent 6,589,522	DJA-1513 to DJA-1521
United States Patent 6,652,881	DJA-1522 to DJA-1530

2316401

REDACTED
IN ITS
ENTIRETY

Webster's
Third
New International
Dictionary
OF THE ENGLISH LANGUAGE
UNABRIDGED

A Merriam-Webster

REG. U.S. PAT. OFF.

*Utilizing all the experience and resources of more than
one hundred years of Merriam-Webster® dictionaries*

EDITOR IN CHIEF

PHILIP BABCOCK GOVE, Ph. D.

AND

THE MERRIAM-WEBSTER

EDITORIAL STAFF

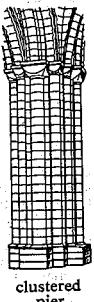


MERRIAM-WEBSTER INC., *Publishers*

SPRINGFIELD, MASSACHUSETTS, U.S.A.

cluster cup

cluster cup *n*: AECIUM
cluster-cup stage *n*: [ME, fr. *cluster* + *-ed*] 1: formed or located in clusters — compare SOLITARY 5a 2: composed or apparently composed of several similar elements clustered together <a ~ pier> (a ~ column)



clustered

clustered bluet *n*: a weed (*Oenothera biennis*) having buttonlike clusters of tiny flowers

clustered purple mallow *n*: a perennial herb (*Callirhoe triangulata*) of the prairie regions of the U.S. with purple flowers in pimulated clusters

cluster fig *n*: an East Indian fig (*Ficus glomerata*) often planted as a shade tree having tapering leaves, small clusters of red fruit, and astringent bark — called also *country fig*

cluster flower *n*: a plant of the genus *Cestrum*

cluster fly *n*: a large dark-brown fly (*Pollenia rufa*) related to the bluebottles and often gathering in large clusters in attics and other sheltered places during cool autumn weather

cluster gear *n*: a set of gears of different sizes mounted as a unit on the same shaft — called also *gear cluster*

cluster-ing-ly *adv*: in a clustering manner

cluster pepper *n*: 1: a hot pepper (*Capsicum frutescens fasciculatum*) with slender elongated bright red and extremely pungent fruits borne erect in clusters 2: the fruit of a cluster pepper

cluster piles *n pl*: piles driven in a close bundle and usu. lashed together with chains or steel bands

cluster pine also **cluster fir** *n* [so called fr. its cones]: a pyramidal pine (*Pinus pinaster*) of the Mediterranean region with reflexed bud scales and needles in pairs

clusters *pl* of **CLUSTER**, pres 3d sing of **CLUSTER**

cluster variable *n*: a short-period variable star of Cepheid characteristics and a period of light fluctuations not longer than a day orig. found in globular clusters but abundant elsewhere in the Milky Way galaxy — called also *cluster-type Cepheid*

cluster wheat *n*: CLUB WHEAT

clutch \kluch\ *vb* -ED/-ING/-ES [ME *cluuchen*, fr. OE *clycan*; akin to OFris *kletsie* spear, Sw *klyka* fork, crotch, MHG *klok* spot, ON *klakkr* lump, Mir *glace* hand — more at CLING] *v* 1: to seize, grip, or hold with the hand or claws 2: to hold or try to retain control or possession of : SEIZE (← power) 2 **obs**: to close tightly: CLENCH (← *ing* hands) — vi 1: to seek to hold or retain possession (← *ed* at her son's devotion —Andrea Parke); take immediate advantage or make immediate use (as of an idea or an opportunity) — often used with *at* (← at remedies that her calmer self would have put by —H.O.Taylor) 2: GRASP, HOLD [roots that are deeply into the earth] 3: to operate a clutch (sense 3) — syn see TAKE

clutch \\" adj 1: of a woman's coat : lacking fasteners and suitable for holding closed with the hand or arm 2: of a woman's handbag : lacking handles and of a size and shape suitable for clasping in the hand

clutch \\" n -es [ME *cloche*, *cloche*, alter. (influenced by ME *cluuchen* to *clutch*) of *cloke*, *cluke*; akin to OE *clycan* to clutch] 1 a: the claws or a hand in the act of grasping or seizing firmly (a rabbit in the ~ of a hawk) b: control, power, or possession esp. of a rapacious or cruel person or an unrelenting force (in the dry, womanless ~ of the army —Irwin Shaw), (the fell ~ of circumstance —W.E.Henley) — often used in pl. (in the ~es of a desperate infatuation —Delmore Schwartz) c: the act of grasping, holding, or restraining: GRASP, GRIP (the gravitational ~ of the earth —N.Y. Times) 2: a device for gripping an object, as at the end of a chain or tackle 3 a: a coupling used to connect and disconnect driving and a driven part of a mechanism esp. one that permits the former part to engage the latter gradually and without shock — see BAND CLUTCH, CENTRIFUGAL CLUTCH, CONE CLUTCH, DISK CLUTCH, FRICTION CLUTCH, MAGNETIC CLUTCH, MAGNETIC FLUID CLUTCH b: a lever operating such a clutch 4: a tight or critical situation (as when the outcome of a game is at stake); PINCH (a batter able to come through with a hit in the ~) (a good ~ hitter)

clutch \\" n -es [alter. of *clutch*] 1 a: a nest of eggs or a brood of chicks b: a group of offspring produced at a birth 2: the eggs laid by a bird at regular consecutive intervals 2: without intervening longer pauses 3: GROUP, BUNCH (a whole ~ of people trooped in together —Mollie Panter-Downes)

clutch-man \\"-mon, -\"-man\ *n*, *pl* **clutchmen** [*clutch* + *man*]: one who operates a clutch; specif: one operating a clutch on a beef-steering machine — called also *cuterman*

clutch-er \\"-kluch'-er\ *n* -er\ *s* [var. of *clutter*] dial Brit: a large quantity: CLUSTER, BUNCH

clutter \\"-klud'-er\ *n*, *pl* -er\ *vb* -ED/-ING/-S [alter. of earlier *clotter*, fr. ME *clotheren* to clot, fr. *clot* + -eren (freq. suffix) — more at CLOT] *v* 1: to crowd together in disorder 2: to fill or cover with things in disorder or scattered at random or with things that impede movement or action or reduce effectiveness (a ~ room) (an author... may ~ his explanations with digressive evidence that delays the reader —G.W.Sherburne) — often used with up (the roads of France ~ed up with refugees —Henri Peyre) — vi 1 now chiefly dial a: to run together in knots or confused crowds; run in disorder b: to make a confused noise: BUSTLE 2: archaic to speak confusedly or inaccurately: jumble words

clutter \\"-n -s 1 a: a crowded or confused mass or collection (a ~ of shops and tenements) : a mass of disorderly or distracting objects or details (pure and noble design, unspoiled by ~ or ornament —E.K.Brown), (steaming ... seaward among a ~ of sister ships —K.M.Dodson) b: LITTER, DISORDER (photographs...) popped up amid a ~ of china ornaments —Hamilton Bass) (pushing aside the ~ on the table —Harriet LaBarre) c: the visual indication on a radar screen of interference or echo from objects other than the target tending to obscure target indication — compare SEA RETURN 2 now dial: turmoil or confusion of movement or activity: DISTURBANCE, HUBBUB: confused noise (adies who were apt to make the greatest ~ upon such occasions —Jonathan Swift) — syn see CONFUSION

clutter-er \\"-klut'-er\ *n* -s: one whose speech is defective by reason of cluttering

cluttering *n* -s: a speech defect in which phonetic units are dropped, condensed, or otherwise distorted as a result of overly rapid agitated utterance

clutchy \\"-klit'-si\ *vb* (perh. fr. LG *kleien* to scratch, fr. MLG; akin to Flem *klauwen* to scratch, steal, G *klauen*, OHG *klawa* claw — more at CLAW) slang: SEIZE, STEAL

clzy \\"-z\ *n* -es [perh. fr. *clzy*] slang: POCKET PURSE

clydesdale \\"klidz'dal\ *n*, *pl* **clydesdales** [fr. *Clydesdale*, valley in Scotland where it originated]: a heavy draft horse of a breed orig. from Clydesdale, Scotland, distinguished by a dark brown or black coat, white blaze and stockings, and heavy feathering about the fetlock

clydesdale terrier *n*, *usu cap C* [fr. *Clydesdale*, valley in Scotland where it originated]: a small terrier of a breed resulting from selective breeding of the Skye terrier and distinguished by tiny erect ears, a long and silky coat, and short legs

clyde-side \\"klid'sid\ *adj*, *usu cap* [Clyde, river in Scotland + E side]: of or relating to the region along the Clyde in Scotland; esp.: having to do with shipbuilding, the chief industry of this region

clyde-sider \\"-do(r)\ *n* -s cap: a native or resident of the region along the Clyde in Scotland

clyde-y \\"klid'(o)r\ *n* -s *D* [klyde gland, scrofula, fr. MD *cliere*; akin to Fris *klyr* gland] 1: a tuberculous lymph gland in cattle 2: clyders *n*: tuberculosis of the bovine lymphatic system

clyme-ne-lia \\"klim'-ne-la\ *n*, *cap* [NL, fr. *Clymena*, an Oceanid (fr. L, fr. Gk *Klymene*) + NL *-ella*]: a genus of polychaete worms common in shallow waters of the northern Atlantic coasts — see BAMBOO WORM

clymenid \\"klim'ē-nid\ *adj* [NL *Clymenidae*]: of or relating to the Clymenidae

clymenid \\"-n -s: a clymenid ammonoid, genus (fr. *Clymena* + NL *-ia*) + -idae]: a family of extinct Devonian ammonoids having the siphuncle on the dorsal margin of the whorl

clype \\"kip'\ *vb* -ED/-ING/-S [alter. of earlier *cleip*, fr. ME *clepien* to call — more at CLEPE] *Scot*: to tell secrets: TATTLE

clype-a-ter \\"kip'e-ast(r)\ *n*, *cap* [NL, fr. *L clypeus* round shield + NL *-aster*]: widely distributed genus (the type of the family *Clypeidae*) of large burrowing cake urchins

clype-a-tris \\"-tris\ *n*, *pl* **clypeastrides** [NL, fr. *Clypeaster* + *-idae* syn of *CLYPEASTRINA*]

clype-a-tris-ter \\"-tris'-ter\ *n*, *pl* **clypeasters** [NL, fr. *Clypeaster* + *-idae*]: a suborder of sea urchins (order *Echinoidea*) comprising a large number of flattened more or less discoidal sea urchins (as the cake urchins and sand dollars) — compare SPATANGINA

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to a clypeaster

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: one of the *Clypeastrinae*: CAKER URCHIN

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

clype-a-tro-roid \\"-tro-royd\ *n*, *pl* **clypeastrids** [NL, fr. *Clypeaster* + *-idae*]: syn of *CLYPEASTRINA*

clype-a-tro-roid \\"-tro-royd\ *adj* [NL *clypeus* + E *-oid*]: of or relating to the *Clypeastrinae*

Katherine Friedman; Katrina Kulp; Mary Berryann
Medical Marketing and Media; May 2000; 35, 5; Research Library
pg. 40

I M S H E A L T H

Business Watch

1999 IN REVIEW

The industry hits new heights at the close of the Millennium

by Katherine Friedman, Katrina Kulp, and Mary Berryann



Katherine Friedman is senior manager, communications and Katrina Kulp is senior analyst at IMS HEALTH. Mary Berryann (not shown) is contributing writer. They can be reached at 610 834-5338.

1999 AT A GLANCE

- The industry recorded a fourth consecutive year of double-digit growth with sales up 19 percent.
- Sales topped \$125 billion, double 1995's \$64 billion, with growth spurred primarily by higher drug utilization.
- Anti-ulcerants remained the sales leader, with cholesterol reducers taking over second spot from specific neurotransmitter modulators.
- Prilosec remained the sales leader, with Lipitor moving into second position.
- Searle's Celebrex was 1999's star new product, with the 12th highest sales volume in its launch year.

The U.S. pharmaceutical industry closed the millennium by soaring to new heights with an unprecedented 19-percent growth. By the end of 1999, the industry had capped the \$125 billion¹ mark in its fourth straight year of double-digit growth, and had virtually doubled its 1995 total of \$64 billion. Consumers filled a staggering 2.8 billion prescriptions², a nine-percent increase over 1998. The \$20.3 billion expansion was driven primarily by higher drug utilization, and while new products did not impact the market as heavily as in 1998,

¹ Represents purchases of prescription pharmaceutical products. Reflects price at trade-level, i.e., sale from wholesaler to chain warehouse, food store warehouse, independent drug store, mail order, non-federal hospitals, federal facilities, clinics, long-term care facilities and HMOs.

² Reflects prescriptions dispensed through chain, independent and food store pharmacies, long-term care facilities and mail order channels.

Exhibit 1

there was one new star on the horizon — Searle's Celebrex — which augmented the company coffers by \$1.4 billion.

Channels of Distribution**Sales**

Retail pharmacy channels accounted for nearly 65 percent of U.S. pharmaceutical purchases, about the same as in 1998. Chain stores were responsible for \$48 billion or 38 percent of the total; independents held a distant second place at \$23 billion and food stores trailed with \$10 billion. Approximately half of the institutional sales (\$30.6 billion) were attributable to non-federal hospitals, followed by clinics and long-term care facilities (see Exhibit 1, right). Mail order pharmacy purchases accounted for \$13 billion to garner a 10-percent share.

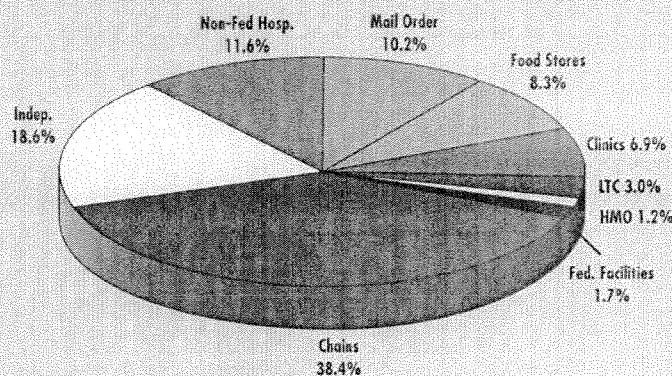
All retail outlets posted healthy purchase increases, with chains and food stores growing by more than 20 percent, while independents expanded by about 15 percent. Clinics and non-federal hospitals in the non-retail market increased sales by approximate \$2 billion; sales to clinics have grown by 26.5 percent compared to non-federal hospitals, which increased by 16 percent. Meanwhile, mail order also increased by \$2 billion for 23-percent growth, and HMOs continued their three-year downward trend, declining by 4.2 percent to \$1.5 billion (see Exhibit 2, right).

Prescriptions

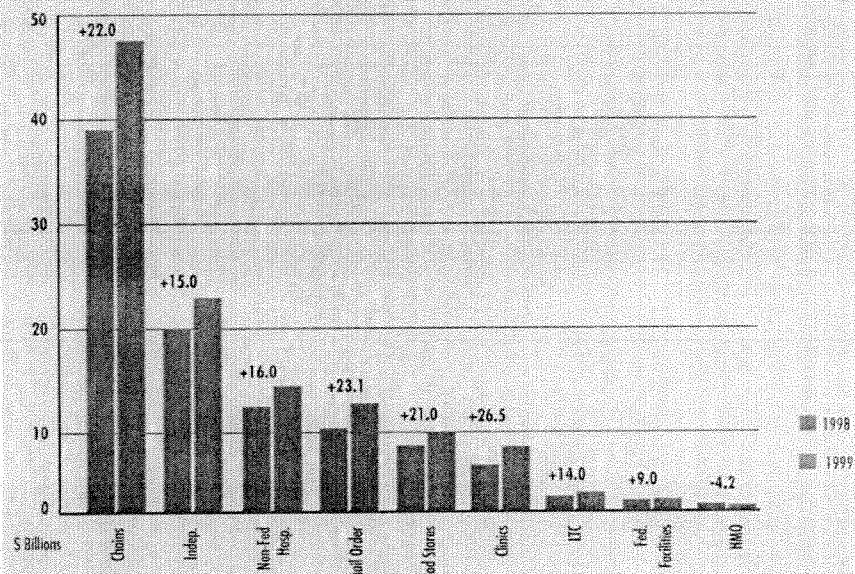
There were no major shifts in distribution during 1999, although chains and food stores showed slight increases in share at the expense of independents. Chain stores dispensed 1.5 billion prescriptions, for a market share of 52.9 percent. Food stores increased by 51.6 million to reach 357.4 million, earning a 12.7 percent share. Independents, despite stronger growth than in 1998, lost market share, dropping 1.2 points to close the books with 25.6 percent for 723.7 million dispensed pre-

1999 Rx PHARMACEUTICAL PURCHASES BY CHANNEL

Total Sales = \$125.1 Billion



Sources: *Retail Perspective™* and *Provider Perspective™*

Exhibit 2**U.S. PHARMACEUTICAL MARKET — CHANGES IN PURCHASE ACTIVITY**

Sources: *Retail Perspective™* and *Provider Perspective™*

IMS HEALTH BUSINESS WATCH

Exhibit 3

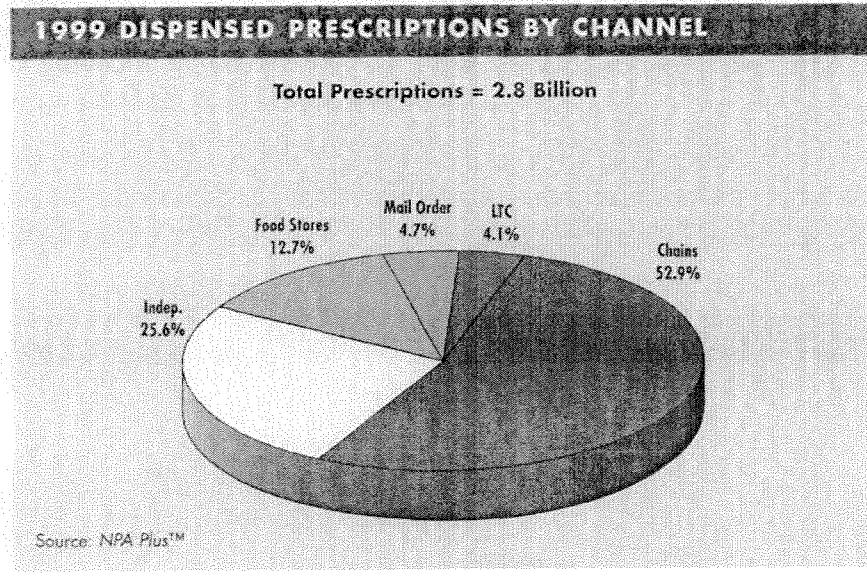
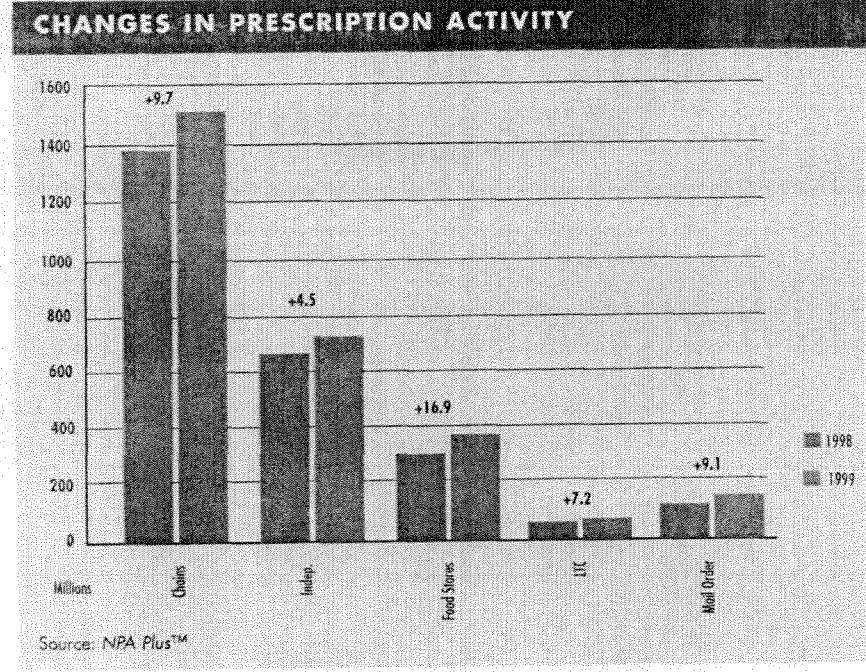


Exhibit 4



scriptions. Long-term care facilities and mail order accounted for the remaining 8.8 percent (see Exhibit 3, above).

Each retail channel recorded a growth rate two to three points higher than in 1998. On the other hand, long-term

care grew by seven percent, whereas the 1998 growth was at one percent. Meanwhile, mail order prescription increases slowed slightly from 12 percent in 1998 to nine percent this year (see Exhibit 4, above).

Leading therapeutic classes

Sales

The top-three classes remained firmly entrenched in their leadership positions, while another blasted onto the top-20 chart (see Exhibit 5, p. 44).

- Anti-ulcerants grew by 19 percent to top the \$8.5 billion mark. AstraZeneca's Prilosec and TAP's Prevacid, two of the top-five products, lead the class with respective 49 and 28-percent shares. Prilosec grew by 21 percent to \$4.2 billion, while Prevacid posted an impressive 67-percent gain to \$2.4 billion (see Exhibit 8, p. 48). The older products in the class, Merck's Pepcid, Lilly's Axid, and Glaxo's Zantac have suffered as a result.
- The statin class moved into second place, growing by 24 percent to \$7.2 billion, and also boasts three products in 1999's top-20 list. Warner-Lambert's Lipitor took the market by storm in 1997, and has sustained its meteoric rise to own 41.4 percent of the class in 1999, with sales of \$3 billion. Both Merck's Zocor and Bristol-Myers Squibb's Pravachol have not only slipped in the overall rankings, but have also dropped more than two points in share of class. Meanwhile, sales of Merck's Mevacor, the 1987 pioneer, and Novartis' Lescol declined sharply for the second straight year.
- Specific neurotransmitter modulators were nudged into third place, after an 18-percent increase to just under \$7 billion. Lilly's Prozac, Pfizer's Zoloft, and SmithKline Beecham's Paxil lead the class, and are among the top-10 products. These three products accounted for 90 percent of the market in 1998 and, despite modest growth, their combined share has dipped to 83 percent for 1999. Newer products — Wyeth's Effexor XR and Forest's Celexa — have taken up the slack.

continued on page 44